



City of Seattle

Gregory J. Nickels, Mayor

Seattle Public Utilities

Ray Hoffman, Acting Director

July 7, 2009

CDL Recycle LLC

Attn: Craig Vierling

5939 4th Ave S

Seattle, WA 98108

Subject: Results from the Environmental Compliance Inspection: **Corrective action required.**

Dear Craig Vierling:

Thank you for your cooperation during the inspection that was conducted at your facility at 7201 E Marginal Wy S. Inspections of commercial and industrial properties are being conducted as part of a King County and Seattle Public Utilities (SPU) joint program to assist businesses in reducing the amount of pollutants discharged to the Duwamish waterway via storm drains and combined sewer overflows. SPU is also inspecting businesses to ensure that they are in compliance with the City's Stormwater, Grading, and Drainage Code (SMC 22.800).

During the inspection several items were identified that must be addressed under SPU's stormwater pollution prevention program. It is your responsibility to comply with the City code. If compliance is not achieved in a timely manner enforcement actions may be taken. The following is the list of required corrective actions we discussed during the inspection:

- **Clean the three catch basins and the drainage lines at the site. The eastern most catch basin does not appear to be draining properly. In addition, SPU collected sediment samples on May 27, 2009, from the western-most catch basin adjacent to 8th Ave S, two surface locations at the site, and the two stockpiles on the eastern portion of the site. The sample results show elevated levels of poly-chlorinated biphenyls (PCBs) and metals, specifically copper, lead, mercury, and zinc, in the catch basin and surface sediment samples. The results indicate that there is a source of PCBs and metals at the site and that these pollutants have migrated into the drainage system and into the City right-of-way. These contaminants must be cleaned, disposed of properly and prevented from reaching the drainage system in the future. Please keep all maintenance records on file.**
- **Improve the level of housekeeping at the facility to reduce track out from the site and reduce sediment discharge to the drainage system. The sediment/dirt track out from your facility, both clean and contaminated, is defined as an illicit discharge under SMC 22.802.012(C). Improved housekeeping also reduces the frequency of catch basin maintenance and reduces the potential for leaks and spills. Please institute one of more of the following at your facility:**
 - Sweep the lot regularly. *YES*
 - Sweep the loading area after each material transfer. The material should be swept up and disposed of properly.
 - Regularly check the catch basins for sediment accumulation and maintain as needed. *YES*
 - Clean up leaks and spills as they occur and employ the spill plan when necessary. *YES*

- Excess waste and old equipment should be disposed of promptly and properly. Waste materials and old equipment can spill or leach pollutants into the storm drain system.
- Your facility is storing empty roll-off containers in the City right-of-way on the east side of 8th Ave S adjacent to your facility. The use of the City right-of-way is permitted by the Seattle Department of Transportation (SDOT). A street use permit is likely required for this activity. I will refer this activity to SDOT for appropriate review and follow up.
REMOVED CONTAINERS

If you have any questions or concerns regarding the above identified stormwater pollution prevention corrections, please contact Brian Robinson at (206) 733-9160 or Brian.Robinson@seattle.gov.

I will return to re-inspect your property within 30 days to ensure that the necessary corrections have been completed. SPU wants to assist business owners in bringing their businesses into compliance voluntarily. However, it is your responsibility to comply with the City code. If compliance is not achieved in a timely manner, a Notice of Violation may be issued that could result in a fine of up to \$500 for each day the violation continues.

SPU is working to reduce pollution in our drainage system and local surface waters. Implementing best management practices at your property is the most effective way to prevent pollutants from entering your storm drains, which ultimately discharge into the Duwamish Waterway. With your help we can improve stormwater quality in Seattle.

Sincerely,



Brian Robinson
Environmental Compliance Inspector

CC: Seattle Department of Transportation, Street Use